

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
CENTRAL DIVISION

CIVIL ACTION NO: 05-CV-40072 FDS

LANDWORKS CREATIONS, LLC)
)
Plaintiff)
)
v.)
)
UNITED STATES FIDELITY AND)
GUARANTY COMPANY and)
LOVETT-SILVERMAN CONSTRUCTION)
CONSULTANTS, INC.)
)
Defendants)

THIRD ASSENTED TO MOTION TO EXTEND TIME TO RESPOND TO DEFENDANT,
USF & G'S MOTION FOR A PROTECTIVE ORDER UNTIL AUGUST, 2007

Now comes the Plaintiff, Landworks Creations, LLC., and moves for an extension until August 10, 2007 to respond to the Motion for a Protective Order filed by Defendant USF & G ("the Moving Party"). As grounds for this motion, the Plaintiff states that the parties are actively working toward resolution of this dispute, or at least substantially narrowing the issues to be presented to the Court. This discovery dispute implicates the records of three law firms, and complex issues and concerns are being addressed. Schedules of negotiating parties, and summer scheduling, have delayed resolution. It is expected that a resolution will either be reached or, in the alternative, that the extension of August 10, 2007 will provide sufficient time for the Plaintiff to respond to the moving papers.

Respectfully Submitted,

Landworks Creations, LLC

By its attorney,

s/Robert N. Meltzer
The Mountain States Law Group
Robert N. Meltzer, BBO #564745
P.O. Box 1459
Framingham, MA 01701
Phone: (508) 872-7116

Assented to:

For the Moving Party,

United States Fidelity & Guaranty Co.

s/Eric Hipp
Eric Hipp, BBO #642658
Hermes, Netburn, O'Connor & Spearing
265 Franklin Street, Seventh Floor
Boston, MA 02109
Phone: (617) 728-0050

July 30, 2007

CERTIFICATE OF SERVICE

I, Robert N. Meltzer, do hereby certify that on this 30th of July, 2007 I served a copy of the foregoing on the following counsel of record by first class mail, postage prepaid:

Hermes, Netburn, O'Connor & Spearing
265 Franklin Street, Seventh Floor
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Attn: Eric Hipp, Esq.

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Attn: Julie Ciollo, Esq.

s/Robert N. Meltzer